

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

In re:) Chapter 11
)
Blackjewel, L.L.C., *et al.*,) Case No. 19-30289
)
Debtors.¹) (Joint Administration Requested)

**DEBTORS' MOTION FOR ENTRY OF AN ORDER
SCHEDULING AN EMERGENCY HEARING**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby move this Court for an order pursuant to Rule 9013-1(f) of the Local Bankruptcy Rules of the U.S. Bankruptcy Court for the Southern District of West Virginia scheduling an emergency hearing on the Debtors' supplemental motion to approve a modified DIP financing proposal and other first-day motions.

1. As the Court is aware, the Debtors were left with no choice but to suspend the hearing on their request to approve debtor in possession financing and other first day relief because the funds necessary to fund the proposed loan were inappropriately frozen by United Bank. Following the events of that hearing the Debtors and their advisors have worked around the clock and have identified an alternative DIP structure that would provide senior secured funding from Mr. Hoops and likely incremental funding from an interested third-party funding source.

2. As set forth in the Debtors' supplemental DIP financing motion, the Debtors are at the precipice of converting these cases to chapter 7. If a hearing on the revised proposal cannot be held today these Debtors expect to have no choice but to convert these cases to chapter 7. If that occurs, untold amounts of value of the Debtors' assets and estates will be destroyed and more than

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: Blackjewel, L.L.C. (0823); Blackjewel Holdings L.L.C. (4745); Revelation Energy Holdings, LLC (8795); Revelation Management Corporation (8908) and Revelation Energy, LLC (4605). The headquarters for each of the Debtors is located at 1051 Main Street, Milton, West Virginia 25541-1215.

1,700 people will be out of work. It is imperative that the revised financing proposal be heard today, if at all possible, if the Debtors are to continue as a going concern. Accordingly, the Debtors request that this court schedule an emergency hearing to consider the supplemental DIP financing motion, specifically the funding to be provided by Mr. Hoops, and other forms of first day relief.

WHEREFORE, the Debtors respectfully request that this court enter an order granting the relief requested and scheduling an emergency hearing today.

DATED: July 2, 2019

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